

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

ANDREA COCHRAN

No. 2:24-mj-00208-KFW

**JOINT MOTION TO EXTEND TIME TO INDICT
UNDER THE SPEEDY TRIAL ACT**

The United States of America and Andrea Cochran (hereinafter, “defendant”), through her undersigned counsel, Matthew Crockett, Esq., hereby move that the Court enter an order under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), excluding the time between July 17, 2024, and October 4, 2024, and extending the date by which the government must indict the defendant until October 4, 2024. In support of this Motion, the parties state the following:

The defendant is charged by complaint with one count of violating Title 18, United States Code, Section 1543, and one count of violating Title 18, United States Code, Sections 1028A(a)(1) and 1028A(b). The defendant made her initial appearance before Judge Wolf on July 18, 2024, and was ordered detained. The defendant currently remains in federal custody.

The government has provided initial discovery materials to the defendant, through counsel, will make other materials available for counsel’s review at the United States Attorney’s Office, and anticipates providing additional discovery as it becomes available. It is possible that review of the discovery materials and conversations between the parties may lead to a resolution of the case through the filing of an information, rather than through indictment. The recency of the defendant’s arrest, the ongoing

production of discovery materials, and the need for conversations between the parties necessitate the exclusion of time and the extension of time to indict of the requested duration. The requested extension of the deadline to indict and the exclusion of the time from July 17, 2024, to October 4, 2024, would permit the matter to be presented to a grand jury in October 2024, if necessary. Absent the requested order, due to scheduling considerations, the government would be required to present this case for indictment in July 2024.

Defense counsel represents that the defendant is aware of her Speedy Trial Act rights and has authorized counsel to seek the extension requested by this joint motion. By the signature of her counsel below, the defendant waives her rights under the Speedy Trial Act to have this matter presented to a grand jury within thirty days of her arrest, consents to the extension of time to indict, and consents to the exclusion of time as requested herein.

The interests of justice to be served by the requested exclusion of time and the requested extension of time to indict outweigh the interests of the defendant and the public in a speedy trial because the potential to resolve the case by agreement would promote a speedy and certain resolution of the case. For these reasons, the ends of justice are served by the requested extension of the Speedy Trial Act deadline for indictment and the exclusion of the time from July 17, 2024, to October 4, 2024.

WHEREFORE, the parties respectfully request that the Court enter an order excluding the period of time between July 17, 2024, and October 4, 2024, from calculation under the Speedy Trial Act and extending the date by which the government must indict the defendant through October 4, 2024.

Respectfully submitted,

FOR THE UNITED STATES:

Darcie N. McElwee
United States Attorney

Dated: July 17, 2024

BY: /s/ Nicholas Heimbach
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FOR THE DEFENDANT:

Dated: July 17, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2024, I electronically filed the Joint Motion to Extend Time to Indict with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

Matthew A. Crockett, Esq.
Counsel for Defendant

DARCIE N. MCELWEE
United States Attorney

BY: /s/ Nicholas Heimbach
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